

**IN THE DRAWINGS:**

Please replace Figures 1A-5 with the amended version included herewith.

**REMARKS**

Claims 1-21 are pending in the application.

The specification is amended to replace reference numeral 122, representing the step of "Transmit Files . . ." in Figure 1B, with new reference numeral 123 in order to avoid duplicate reference numerals.

The drawings are objected to for being informal. Figures 1A-5 are replaced with replacement formal Figures 1A-5. Also, Figure 1B is amended to replace reference numeral 122, representing the step of "Transmit Files . . .", with new reference numeral 123 in order to avoid duplicate reference numerals. Replacement sheets are enclosed that include formal Figures 1A-5.

Claims 1-21 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Publication No. 2004/0153663 to Clark et al, hereinafter "Clark". Applicants respectfully traverse this rejection.

Independent claim 1 provides a method for data cleansing, including receiving at least one input address, comparing the at least one input address to at least one standard, and providing a single best address derived from the at least one input address based on the comparison.

Clark discloses a system and method for detecting or assessing the risk of identity theft fraud (par. 0027). Steps of the method include obtaining new address information and comparing the new address information to a reference address, which may be an address obtained from a credit report for the person or the current address prior to the change of address (par. 0028). Demographic data associated with the addresses is gathered and analyzed, and an assessment of relative risk of identity theft fraud is made based on the analysis (par. 0028). As such, the present invention

analyzes demographic data that is associated with a specific street address when presented as an address change on an existing account or an address included on a new 10 account application when that address is different from a reference address (par. 0028). In general, the present invention uses statistical modeling of negative and demographic/socio-economic data elements associated with a street address to identify suspected identity theft fraud activity when there is a change in address or an address on a new application that is different from a reference address (par. 0031)

Information is derived relating to inquiry activity relating to both new address and the reference addresses, which is stored and updated in an address velocity file (par. 0222). Information including frequency of inquiries, previously scored addresses, warm address data, and customer maintained known fraud address file coupled with the U.S. Postal Service National Change of Address Database is used in a score development process (par. 0222). The score is used to predict the risk of fraud associated with an address (par. 0223).

Clark thus provides a method for determining a risk of fraud associated with an entity's change of address. The method includes comparing a reference address with a new changed address. If the addresses are different, the method analyzes the new address based on demographic data associated with that address, to determine if someone other than the original entity has attempted to steal the original entity's identity and is attempting to change the entity's address. If the new address exhibits different demographic characteristics, such as being located in a more down-scale socioeconomic demographic (par. 0029), this could indicate a potential for fraud.

Clark does not disclose or suggest comparing the new address and the reference address to confirm the accuracy of the reference address or new address. Furthermore, Clark only discloses producing a risk indication or risk score based on the comparison, and **does not disclose or suggest producing a "best address" derived from the two addresses**. Therefore, Clark does not disclose or suggest a method including "receiving at least one input address; comparing said at least one input

address to at least one standard; and providing a single best address derived from said at least one input address based on said comparison," as recited in claim 1.

Thus, Clark fails to disclose or suggest the elements of claim 1. Therefore, claim 1 is patentable over Clark.

Independent claims 12 and 20 include recitals similar to claim 1. For at least reasoning similar to that provided in support of the patentability of claim 1, claims 12 and 20 are patentable over Clark.

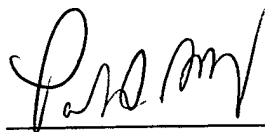
Claims 2-11 depend from claim 1, claims 13-19 depend from claim 12, and claim 21 depends from claim 20. For at least reasoning similar to that provided in support of the patentability of claims 1, 12 and 20, claims 2-11, 13-19 and 21 are patentable over Clark.

For the reasons set forth above, the rejection of claims 1-21 under 35 U.S.C. 102(e) as anticipated by Clark is overcome. Applicants respectfully request that the rejection of claims 1-21 be reconsidered and withdrawn.

An indication of the allowability of all pending claims by issuance of a Notice of Allowability is earnestly solicited.

Respectfully submitted,

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